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February 28, 2013

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: NOTICE OF EX-PARTE COMMUNICATION

In the Matter of Reliability and Continuity of Communications Networks, Including Broadband Technologies, PS Docket No. 11-60; *In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications*, PS Docket No. 11-153; and *In the Matter of Framework for Next Generation 911 Deployment*, PS Docket No. 10-255.

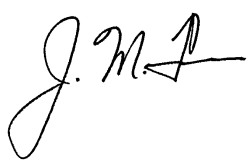
Dear Ms. Dortch:

On February 26th, I spoke with Courtney Reinhard, Legal Advisor to Commissioner Pai, to follow up regarding a question posed by the Commissioner during the afternoon session of the FCC's Superstorm Sandy Field Hearings on February 5th. In response to Commissioner Pai's question requesting some of the details of AT&Ts deployment of next-generation emergency services networks and the implications thereof, I provided Ms. Reinhard with a copy of the attached document, an AT&T case study (as background information) regarding our experiences thus far in upgrading the legacy emergency services networks in the state of Tennessee.

In accordance with the Commission's rules, this letter and the attached presentation are being filed in the above-referenced dockets via the FCC's Electronic Comments Filing System.

Should you have any questions regarding the above or the attached, please feel free to contact me directly.

Sincerely,



Cc: Ms. Courtney Reinhard (via e-mail)

Attachment

FLICKR/STEVE LYON

9-1-1 Innovation in the Volunteer State

TENNESSEE'S NEW IP-BASED EMERGENCY RESPONSE NETWORK WILL MAKE EMERGENCY SERVICES FASTER, EASIER AND MORE RELIABLE.

When an emergency, disaster or accident strikes, everyone knows the drill: dial 9-1-1. But in emergencies, speed is paramount and accuracy is critical. While dialing an emergency line certainly means help is on its way, the speed with which help comes and the information first responders have when they arrive has traditionally been impacted by the limitations of technology. Tennessee is working to change that. By combining a healthy appetite for innovation with effective central oversight, the state is charging ahead of the 9-1-1 curve.

Tennessee is in the process of updating its legacy, analog 9-1-1 system to a digital, IP-based platform that will help dispatchers and responders assess situations and execute optimal plans of action at the rapid pace that emergencies require.

Traditionally, 9-1-1 systems have operated within firm jurisdictional boundaries, often along county and state lines. Transferring an incoming call to authorities in the appropriate jurisdiction can be a slow process, and in the age of mobile phones, calls can frequently originate from other areas. Tennessee's next-generation system will consolidate the state's jurisdictions into a single entity, ensuring faster response times — and increasing the number of lives saved.

"The next-generation statewide network will allow the transfer of 9-1-1 calls to the appropriate jurisdiction much easier," said Steve Smith, director of the Rutherford County Communications District. "Having this foundation will offer our Public Safety Answering Points more opportunities in the future to improve services and efficiency."

"This way, the whole state is totally connected on the same network," said Randy Porter, chairman of Tennessee's Emergency Communications Board.

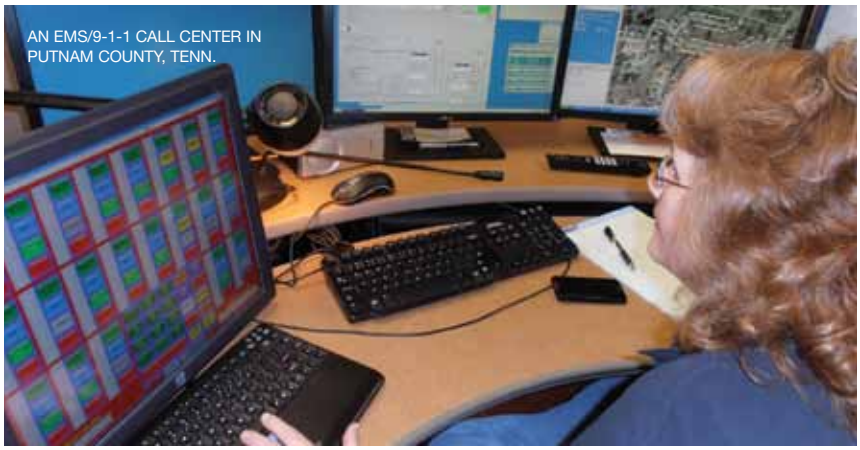
The IP-based network will also raise emergency response standards statewide, allowing individuals in rural areas to receive the same level of service as their big-city counterparts in Nashville and Memphis. "It's for everyone. It doesn't make any difference how big, how small or how rural," said Porter. "Tennessee is one of the first few states to do this."

Additionally, neighboring states that set up their own IP-based 9-1-1 systems in the future will be able to link with Tennessee's system, enabling faster transfers of information and sharing of resources across state lines, all in the interest of public safety. "It's unlimited as to what we can do with this nationwide," said Porter.

RETHINKING THE POSSIBLE

Society is increasingly relying on mobile technology, as more people — young and old — use mobile phones exclusively. Until recently, this posed a significant problem for 9-1-1 systems, which could not determine the location of mobile callers with the necessary level of accuracy. A next-generation digital system, like the one Tennessee is implementing, does have such capability. "Typically, we can get information such as where the person is calling from, the latitude and longitude, and have a map pop up with them on it," said Randall Lewis, assistant director of Emergency Management for Washington County, Tenn.

Officials are also excited about the potential of leveraging the IP platform



AN EMS/9-1-1 CALL CENTER IN PUTNAM COUNTY, TENN.

to incorporate text, picture and video capabilities into the new system. In the future, the platform could allow citizens to contact emergency services in several different ways, depending on the situation. "If somebody were to have an accident, say out on some rural road, and they were able to snap a picture, it might be able to give the dispatcher a better idea of where they are," explained Kim Augustine, 9-1-1 Director for Madison County, Tenn. "A picture paints a thousand words right there."

Text, photo and video could make a significant difference for citizens, dispatchers and responders involved in life-threatening situations.

"If there was a breaking and entering in progress, and the caller is hiding in the closet, they know they can't talk … [the intruder] will be able to hear," said Augustine. In such a situation, the best way to call for help "is to text 9-1-1."

In addition, emergency situations with video feeds could someday be observable by responders planning to intervene in risky circumstances with minimal information provided by callers, who are often confused and scared. "When someone calls 9-1-1, as a rule, they're panicked," said Augustine. "If a dispatcher can actually see the scene, they're picking up more information, and they don't have to ask nearly as many questions."

Further advances in consumer technology should be easily compatible with the new system, thanks to the shared IP foundation. "Everything will be IP-based," said Porter. "Any kind of new technology that comes out, if it can dial 9-1-1, we should be able to handle because it's IP-based."

HELP FROM ABOVE

Tennessee's adoption of an IP-based system may not have been possible without the contributions of the state's Emergency Communications Board, a collection of nine experts that oversees 9-1-1 and emergency management systems statewide. It shows clear leadership for a state to centralize its 9-1-1 and emergency operations, and the setup has helped Tennessee immensely.

"I cannot commend [the board] enough for the job they've done," said Augustine. "Instead of every county or district for themselves, they have made it a statewide initiative … You don't have larger counties that implement and leave the rural ones behind."

Porter, the board's current chairman, is a huge proponent of the solution, emphasizing its positive impact on implementation speed. "When you're doing it for a whole state," Porter said, "it makes it a whole lot easier" than doing it county-by-county. You've got some states in the country that haven't even done Phase 2 in wireless yet. We did that 10 years ago."

COLLABORATION ENHANCES POSSIBILITIES

Tennessee collaborated with AT&T to implement the new statewide solution, and officials have been very impressed with the company's performance. "They've just been great to work with," said Porter. "They've been bending over backwards to make this thing work."

Among other competencies, AT&T is helping to set up the IP network, install new core switches, and build two new data centers with failover capability. The redundant data centers will help emergency response operations run more smoothly in the event of a natural disaster or other unanticipated wide-scale event. "With next-generation 9-1-1, [the data centers] will afford us greater disaster recovery and contingency planning operations," said Porter.

MOVING FORWARD, TOGETHER

The statewide IP-based 9-1-1 solution is still in the implementation stages, but officials are confident that it will revolutionize emergency response within Tennessee's borders. All cities and communities, large and small, will gain access to the highest level of emergency services possible. "Nobody wants to be left behind," said Augustine. "This is just bringing the whole state together — all for one, one for all."